

FDD 6888
5B-C
3/6/15



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

MAR - 6 2015

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-127

Certified Mail Number 7012 1010 0003 2880 7457
Return Receipt Requested

J. Wayne Maxie, R.G.
Manager, Environmental Projects
Agrium US, Inc.
4582 S Ulster Street Suite 1700
Denver, CO 80237-2641

Re: Proposed Modifications to Groundwater Monitoring Program
Administrative Order on Consent for Nu-West Industries, Inc.
Idaho Facility, Docket No. RCRA-10-2009-0186

Dear Mr. Maxie:

This letter responds to proposed modification to the current Groundwater Monitoring Program at the Nu-West Industries facility, as requested by letter dated February 13, 2015, from your contractor WSP. We discussed the proposed modifications by conference call on March 2.

The Groundwater Monitoring Plan, Revision 3, dated November 12, 2014, requires sampling and analysis for the radiological parameters of gross alpha, gross beta, radium-226 and radium-228, and for total mass uranium.

The maximum contaminant level (MCL) for gross alpha activity is 15 pCi/l, but excludes contributions from radon and uranium, as explained at 40 Code of Federal Regulations (CFR) § 141.66(c). The MCL for uranium is 30 µg/l.

When reporting results for gross alpha activity, the contribution from uranium to the total alpha particle activity must be subtracted out. A conversion factor from total mass uranium to alpha activity is provided in the table at 40 CFR § 141.25 as footnote 12. After taking into account the contribution from uranium, the gross alpha activity reported in many of the groundwater samples at the Nu-West facility appears to be attributed to the presence of uranium. Past sampling results from groundwater monitoring wells A-19-240 and A-28-110 have indicated elevated gross alpha activity that is not entirely explained.

The requirement to monitor for radium-226, radium-228, and gross beta activity is discontinued. The requirement to monitor for gross alpha activity is discontinued, except at monitoring wells A-19-240 and A-28-110. EPA is requiring additional gamma spectroscopy analyses to identify and quantify the specific source(s) of this activity at these two monitoring wells.

The Groundwater Monitoring Plan specifies in Table 5-2 fluoride analyses by EPA test method 300 for groundwater samples sent off-site for analysis by Accutest Laboratories. Future fluoride analyses for

FILE COPY

samples sent off-site will need to be conducted using the ion-specific electrode test method, SM 4500 F-B-C. There is no change in the test method for samples analyzed by the CPO Laboratory.

The Groundwater Monitoring Plan specifies in section 5.1 and Table 5-1 a monthly sampling frequency for seven soil-bedrock interface groundwater monitoring wells located within the A-34 area. The letter from WSP requested a reduction in sampling frequency for these monitoring wells.

The Nu-West facility is currently in operation, with active releases, other source areas from past releases, and changes in plant operations / containment systems, the effectiveness of which hasn't been fully determined. All of these factors contribute to a dynamic contaminant source release and transport conceptual site model and groundwater system that we are still attempting to better understand. Corrective action has not been implemented at the site. It is premature to reduce the frequency of monitoring.

As an alternative to monthly groundwater sampling in the shallow soil / bedrock interface monitoring wells, EPA suggests installation of a series of transducers within the shallow monitoring wells and gathering of data daily for the following parameters: groundwater elevation, temperature, pH, and conductivity. The daily data would provide more responsive information to the company in release detection and determine the overall effectiveness of operational improvements. These sensors could be linked to data loggers, which would allow the data to be collected and transmitted with a significantly reduced level of labor for data collection and analysis, and would result in long term optimization of the required plant area monitoring. Under such a change, quarterly sampling of the shallow soil / bedrock interface monitoring wells would still be required. EPA proposes that the following locations should be given priority in such a transducer monitoring regime: A-34, A-37, A-42, A-48, A-59, and A-62.

A revised Groundwater Monitoring Plan reflecting the changes in monitoring will need to be submitted for approval. It is my understanding that your staff is preparing to conduct the first quarter groundwater sampling this month, which will likely commence prior to submittal of a revised Groundwater Monitoring Plan. In the interim, this letter serves as approval for a reduction in the radionuclide monitoring and a change in the fluoride test method as described above.

Thank you for your attention to this important matter.

Sincerely,



Peter Magolske
Air and RCRA Compliance Unit

cc: Brian Monson, Idaho Department of Environmental Quality
P. Scott Burton, Esq. Hunton and Williams LLP
Timothy J. Carlstedt, Esq. Hunton and Williams LLP

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4® in this box•

OCE -127 MAGOLSKY
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Sent To	
Street, Apt. No., or PO Box No.	
City, State, ZIP+4	
PS Form 3800, August 2006	
See Reverse for Instructions	

7012 1010 0000 0101 2102 542 0882 2880 7457

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

J. Wayne Maxie
Manager, Environmental Projects
Agrium US, Inc.
4582 S. Ulster Street, Suite 1700
Denver, CO 80237

2. Article Number

(Transfer from service label)

7012 1010 0003 2880 7457

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☐ Agent☐ Addressee

B. Received by (Printed Name)

Lisa Helms

C. Date of Delivery

3/9/15

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail®☐ Priority Mail Express™☐ Registered Mail®☒ Return Receipt for Merchandise☐ Insured Mail☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes**Certified Mail Provides:**

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047